

OFFICE OF THE COMPTROLLER OF THE CURRENCY
CHIEF COUNSEL SYSTEMS
PRIVACY IMPACT ASSESSMENT

A. Contact Information

- **Name of system/application:** Chief Counsel Systems

- **Office of Responsibility:** Chief Counsel

- **Contact information of the person completing this document, (Name, title, organization and contact information):**
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- **Contact information of the System or Program Manager, (Name, title, organization and contact information):**
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B. Qualification Questions:

- 1) Does this system collect any personal information in identifiable form about individuals?
Yes

- 2) Does the public have access to the system? **Yes, data on E-Corp is accessed by national banks. However, no individually identifiable personal information is stored on E-Corp.**

- 3) Has a PIA been done before? **Yes, for parts of the system (i.e., those covered by a System of Records report)**

- 4) Has it been at least three years since the last PIA was performed? **Yes, for parts of the system**

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5) Has the system changed since the last PIA was performed? **Yes**

C. Data in the System/Application

- **Describe the information to be collected, why the information is being collected, the intended use of the information, and with whom the information will be shared.**

A Major Application comprising program code and business logic to provide a repository and decision tools to support the chartering and continuing supervision and regulation of national banks based on legislative, regulatory and OCC standards. The individually identifiable personal information is potentially shared with supervisors, ethics officers, officials with the Office of Government Ethics, and the general public (in the case of financial disclosures).

- **What are the sources of the information in the system?**

National Banks, government agencies, and OCC employees

- **How will the data collected from sources other than Federal agency records or the individual be verified for accuracy?**

No individually identifiable personal information is collected from entities outside the Federal Government.

- **Who will have access to the data and how is access determined?**

Access is determined on a need-to-know or role basis. Please refer to the OCC Chief Counsel Security Plan.

- **Describe the administrative and technological controls that are in place or that are planned to secure the information being collected.**

The Chief Counsel major application has management, operational, and technical controls in place to secure collected information. Some of the areas of protection include: Rules of Behavior, Security controls, Security Awareness Training, Physical and Environmental controls, Production Input/Output controls, Contingency Planning, Data Integrity controls, Identification and Authentication controls, and Logical Access controls. Refer to the Chief Counsel security plan for further details for protection controls.

- **What opportunities will individuals have (if any) to decline to provide information or to consent to particular uses of the information?**

The Chief Counsel applications do not directly collect Privacy Act information from members of the public. Human Resources policies address what rights employees have to decline or access the information they provide.

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- **What is the life expectancy of the data and how will it be disposed of when it is no longer needed?**

The life expectancy varies by application. In some cases, this is governed by statute or regulation.

- **Does the collection of this information require a new system of records under the Privacy Act (5 U.S.C. § 552a) or an alteration to an existing system of records?**

No

The Following OCC Officials Have Approved this Document:

SIGNATURE

XX/XX/2004
DATE

SIGNATURE

XX/XX/2004
DATE